

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
Civil Action No.: 1:25-cv-00086-UA-LPA**

**BAHAR LEVENTOGLU,**

**Plaintiff,**

**v.**

**DUKE UNIVERSITY,**

**Defendant.**

**JOINT 26(f) REPORT**

1. Pursuant to Fed. R. Civ. P. 26(f) and LR16.1(b), a meeting was held on March 13, 2025 virtually via videoconference and was attended by Michael A. Kornbluth and Andrew W. Legg for Plaintiff, and Charles E. Johnson and Spencer T. Wiles for Defendant.

2. Discovery Plan. The parties propose to the Court the following discovery plan:

- If there is a pending dispositive motion: Discovery should not be postponed or limited pending determination of a pending dispositive motion.
- The “commencement date” of discovery will be upon entry of this Order;
- Discovery will be needed on the following subjects:

a) Plaintiffs' claims arising under Title VII of the Civil Rights

Act of 1964 42 U.S.C. § 2000e-2; the Civil Rights Act of 1866

42 U.S.C. § 1981; and breach of contract; and for damages; and

b) Duke's affirmative defenses.

- Discovery shall be placed on a case-management track established in LR 26.1. The parties agree that the appropriate plan for this case (with any stipulated modification by the parties as set out below) is that designated in LR 26.1(a) as:

Complex

- The date for the completion of all discovery (general and expert) is December 31, 2025.
- Stipulated modifications to the case management track include: The Parties agree that discovery will be governed by the dates herein and each Party will be entitled to thirty interrogatories (including subparts).
- Reports required by Rule 26(a)(2)(B) and disclosures required by Rule 26(a)(2)(C) are due during the discovery period by August 1, 2025. Reports and disclosures required of rebuttal expert witnesses under Rule 26(a)(2)(D)(ii) are due during the discovery period by September 15, 2025.
- Supplementations will be as provided in Rule 26(e) or as otherwise ordered by the court.

3. Mediation. Mediation should be conducted late in the discovery period, the exact date to be set by the mediator after consultation with the parties. The parties agree that the mediator shall be Kenneth Carlson.

4. Preliminary Deposition Schedule. Preliminarily, the parties agree to the following schedule for depositions each party is entitled to nine (9) depositions, including experts, to be taken no later than December 31, 2025.

The parties will update this schedule at reasonable intervals.

5. Other items.

- Plaintiff should be allowed until July 14, 2025 to request leave to join additional parties or amend pleadings.
- Defendant should be allowed until July 28, 2025 to request leave to join additional parties or amend pleadings.
- After these dates, the Court will consider, *inter alia*, whether the granting of leave would delay trial.
- The parties stipulate that they will serve disclosures under Fed. R. Civ. P. 26(a)(1) by April 14, 2025.
- The parties have discussed special procedures for managing this case, including reference of the case to a Magistrate Judge on consent of the parties under 28 U.S.C. §§ 636(c), or appointment of a master and do not consent to the

referral of this case to a Magistrate Judge or appointment of a master.

- Trial of the action is expected to take approximately four to five days. A jury trial has been demanded.
- The parties discussed whether the case will involve the possibility of confidential or sealed documents.

\_\_\_\_ The parties agreed that no documents in this case will be designated as confidential or filed under seal.

OR

\_\_X\_\_ The case may involve confidential or sealed documents and the parties have separately filed a LR 5.5 Report.

This 17th day of March, 2025.

/s/ Michael A. Kornbluth

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